

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

FAIR SPIRIT MARITIME LTD.

Plaintiff,

vs.

INTERNATIONAL OIL OVERSEAS INC.
a/k/a IOOI, MARINA WORLD SHIPPING
CORP., GRESHAM WORLD SHIPPING
INC., BAKRI TRADING INC., TARAZONA
SHIPPING CO., S.A., SCHIFF HOLDING
CO. S.A. and QUOIN ISLAND MARINE
WL.

Defendant.

08 Civ. 10109 (WHP)

**DECLARATION OF
HANI BAKRI
PURSUANT TO 28 U.S.C. § 1746**

MOHAMMED HANI AL BAKRI hereby declares pursuant to 28 U.S.C.
§ 1746, that:

1. I am a director of defendant Bakri Trading Inc. (individually "Bakri Trading") and defendants Marina World Shipping Corp., Gresham World Shipping Inc., Tarazona Shipping Co., S.A., Schiff Holding Co. S.A. and Quoin Island Marine WL (collectively with "Bakri Trading," the "Bakri Trading Defendants").
2. The Bakri Trading Defendants are affiliated entities but they are not related to defendant International Oil Overseas Inc. ("IOOI").
3. The members of the board of directors for the Bakri Trading Defendants, except Quoin Island Marine WL ("Quoin Island") are Sheik Abdul Kader Al Bakri, Dr. Zohair A.K. Al Bakri and Mr. M. Hani A.K. Al Bakri.
4. The principal place of business of Bakri Trading is Al Bakri Building, First Floor, Western Block, Al Maadi Street, Al Hamra District, Jeddah , Saudi Arabia.

5. The principal place of business of Marina World is Al Bakri Building, Second Floor, Eastern Block, Al Maadi Street, Al Hamra District, Jeddah , Saudi Arabia.
6. The principal place of business of Tarazona Shipping is Al Bakri Building, Second Floor, Western Block, Al Maadi Street, Al Hamra District, Jeddah , Saudi Arabia.
7. The principal place of business of Gresham World is Al Bakri Building, First Floor, Eastern Block, Al Maadi Street, Al Hamra District, Jeddah , Saudi Arabia.
8. The principal place of business of Schiff Holding is Al Bakri Building, First Floor, Western Block, Al Maadi Street, Al Hamra District, Jeddah , Saudi Arabia.
9. The members of the board of directors of Quoin Island are Mr. Waleed A.K. Al Bakri and Mr. Hani A.K. Al Bakri.
10. The principal place of business of Quoin Island is 7th Floor, Entrance Number 2, Manama Center, Government Avenue, Manama, Kingdom of Bahrain.
11. None of the Bakri Trading Defendants have any office, bank account, employee or agent in New York, or any other district in the United States.
12. None of the Bakri Trading Defendants transact any business in New York or any other district in the United States.
13. Upon information and belief, the members of the board of directors IOOI are Mr. Abdul Kader Mohammed El Amin, Mr. Fahad Galib and Mr. Saber Abu Ammra.
14. Upon information and belief, the principal place of business of IOOI is P.O. Box 1396, Fujairah, United Arab Emirates.
15. The Bakri Trading Defendants have a long standing business relationship with IOOI for the chartering, re-chartering and sub-chartering of vessels, but IOOI is not related in any way to the Bakri Trading Defendants.

16. At all times, transactions between any of the Bakri Trading Defendants and IOOI are at arm's length.

17. From time to time, Bakri Trading has made payments on behalf of IOOI as a set-off against money Bakri Trading owes to IOOI.

18. At no time has Bakri Trading guaranteed the debts of IOOI except in litigations, when it was forced to post the bond due to the attachment of electronic funds transfers of Bakri Trading's under Rule B.

19. Similarly, from time to time, Marina World has made payments on behalf of IOOI as a set-off against money Marina World owes to IOOI.

20. No officer or director of any of the Bakri Defendants have any control over the operations of IOOI.

21. No officer or director of IOOI have any control over the operations of any of the Bakri Defendants.

22. The Bakri Trading Defendants and IOOI have no common officers, directors, or employees nor conduct business as a common enterprise.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 2, 2010

By:


MOHAMMED HANI AL BAKRI